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12 **UNITED STATES BANKRUPTCY COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **NORTHERN DIVISION**
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17 In re:

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20 HVI CAT CANYON, INC.,

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23 Debtor.
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Case No. 9:19-bk-11573-mb

Chapter 11

**JOINDER TO SUPPLEMENTAL
OBJECTION OF THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS [Docket No. 525] TO:
EMERGENCY MOTION FOR AN
ORDER: (1) AUTHORIZING THE
TRUSTEE TO OBTAIN SECURED
PRIMING SUPERPRIORITY
FINANCING; (2) AUTHORIZING
CONTINUED USE OF CASH
COLLATERAL; (3) SCHEDULING A
FINAL HEARING; AND (4) GRANTING
RELATED RELIEF [Docket No. 474]**

Date: November 21, 2019

Time: 2:30 p.m.

Place: 1415 State Street

Courtroom 201

Santa Barbara, CA 93101

Judge: Hon. Martin R. Barash

43 **PLEASE TAKE NOTICE** that Weltman & Moskowitz, LLP (“WM”), former counsel to
44 Debtor, HVI Cat Canyon, Inc. (“Debtor”), prior to appointment of the Chapter 11 Trustee
45 (“Trustee”), hereby files this joinder to the Supplemental Objection (“Supplemental Objection”) of
46 the Official Committee of Unsecured Creditors (“Committee”) [Docket No. 525] to Trustee’s
47 Motion for an Order: (1) Authorizing the Trustee to Obtain Secured Priming Superpriority
48 Financing; (2) Authorizing Continued Use of Cash Collateral; (3) Scheduling a Final Hearing; and
49 (4) Granting Related Relief [Docket No. 474] and supports the relief requested therein.

50 The Trustee Financing Motion¹ seeks final approval of financing (the “Trustee Facility”)
51 provided by UBS AG, Stamford Branch, an affiliate of UBS AG, London Branch, the Debtor’s
52 asserted prepetition secured creditor. The Trustee Facility does not provide for payment of
53 administrative expenses to estate professionals.

54 WM represented Debtor for the post-petition period and incurred administrative fees and
55 expenses in excess of \$500,000 during the course of this representation. WM provided substantial
56 services to Debtor and the estate during its tenure as Debtor’s counsel. While WM recognizes that
57 this Court cannot force UBS to finance the administrative expenses of this estate, if the case is to
58 proceed in chapter 11 administrative expenses must be paid and WM joins in the Supplemental
59 Objection.

60 DATED this 21th day of November 2019.

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62 **WELTMAN & MOSKOWITZ, LLP**

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65 By: /s/ Michael L. Moskowitz
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¹ Capitalized terms not otherwise defined herein are ascribed the meaning provided in the Supplemental Objection.